

1 LYSSA S. ANDERSON
2 Nevada Bar No. 5781
3 KRISTOPHER J. KALKOWSKI
4 Nevada Bar No. 14892
5 KAEMPFER CROWELL
6 1980 Festival Plaza Drive, Suite 650
7 Las Vegas, Nevada 89135
Telephone: (702) 792-7000
Fax: (702) 796-7181
landerson@kcnvlaw.com
kkalkowski@kcnvlaw.com
*Attorneys for Defendants,
Colin Haynes, Lt. Nathan Chio*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

10 | ROBERT COACHE, an Individual,

11 Plaintiff,

VS.

MARC DIGIACOMO, an individual and an employee of a government entity; COLIN HAYNES, an individual and an employee of a government entity; NATHAN CHIO, an individual and an employee of a government entity; and DOES 1-30.

16 Defendants.

Case No.: 2:21-cv-01334-RFB-BNW

**STIPULATION, REQUEST AND ORDER
EXTENDING TIME TO FILE
RESPONSES TO MOTIONS TO DISMISS
[ECF NOS. 61 and 62]**

(Second Request)

18 Defendants, Colin Haynes and Lt. Nathan Chio (“LVMPD Defendants”), by and through
19 their counsel Kaempfer Crowell, Defendant Marc DiGiacomo, by and through his counsel
20 Deputy District Attorney, Scott Davis, and Plaintiff, Robert Coache, by and through his counsel
21 Ralph Schwartz from Ralph Schwartz, PC and Edwin Brown from Brown Clark Le Ames
22 Stedman & Cevallos LLP, hereby respectfully submit this Stipulation, Request and Order
23 Extending Time to File Responses to Motions to Dismiss. This is the second request for an
24 extension of time to respond to the Motions to Dismiss.

1 The LVMPD Defendants and DiGiacomo were served with Plaintiff's Amended
2 Complaint on November 1, 2022. In response, DiGiacomo filed a Motion to Dismiss on
3 November 29, 2022, [ECF No. 61] and the LVMPD Defendants filed a Motion to Dismiss on
4 that same day also, [ECF No. 62]. The instant extension is requested as the Plaintiff's Counsel
5 requires additional time to prepare responses to both Motions to Dismiss due to the holiday
6 season.

7 Upon agreement by and between all the parties hereto as set forth herein, the undersigned
8 respectfully requests this Court grant an extension of time, up to and including January 3, 2023,
9 for Plaintiff to file responses to the Motions to Dismiss, [ECF Nos. 61 and 62]. In addition, the
10 LVMPD Defendants and Di Giacomo, likewise, respectfully request that the time to file their
11 respective reply briefs be extended up to and including January 23, 2023.

12 DATED this 20th day of December, 2022.

13 RALPH A. SCHWARTZ, PC

KAEMPFER CROWELL

14 /s/ *Edwin B. Brown*

/s/ *Lyssa S. Anderson*

15 RALPH A. SCHWARTZ
Nevada Bar No. 5488
16 400 S. 7th Street, Suite 100
Las Vegas, NV 89101

LYSSA S. ANDERSON
Nevada Bar No. 5781
KRISTOPHER J. KALKOWSKI
Nevada Bar No. 14892
1980 Festival Plaza Drive, #650
17 Las Vegas, Nevada 89135
Attorneys for Defendants,
Colin Haynes, Lt. Nathan Chio

18 EDWIN B. BROWN
(Admitted Pro Hac Vice)
California Bar No. 89447
19 BROWN CLARK LE AMES STEDMAN &
CEVALLOS LLP
22342 Avenida Empresa, Ste. 125
Rancho Santa Margarita, CA 92688
20 **Attorneys for Plaintiff, Robert Coache**

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1 CLARK COUNTY DISTRICT ATTORNEY

2 */s/ Scott Davis*

3 STEVEN B. WOLFSON

4 Nevada Bar No. 1565

SCOTT DAVIS

Nevada Bar No. 10019

TIMOTHY ALLEN

Nevada Bar No. 14818

500 South Grand Central Pkwy

6 Las Vegas, NV 89155-2215

7 *Attorneys for Marc DiGiacomo*

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10 **ORDER**

11 IT IS SO ORDERED.

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13 
RICHARD E. BOILWARE, II

14 **United States District Court**

15 DATED this 27th day of December, 2022.

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